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GUSTAVE H. NEWMAN (1927-2017)

WILLIAM J. DOBIE


June 27, 2023

Application granted.

BY ECF

Hon. Ronnie Abrams
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

SO ORDERED.


Ronnie Abrams, U.S.D.J.
June 28, 2023

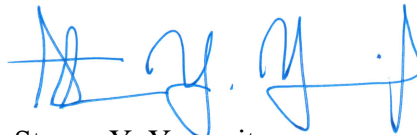
Re: *United States v. Yoel Abraham, et al.*,
(Motion on consent to Modify Bail Conditions)

Dear Judge Abrams:

This firm represents Heshl Abraham, one of the defendants in the above-referenced matter. I am writing to request a modification to Heshl's bail condition to permit travel by him to the State of Florida. Heshl and his family are being forced to vacate their current home in Spring Valley, New York. In view of the high cost of living in the tri-state area, Heshl would like to relocate with his family to Tampa, Florida where there is a growing Orthodox and more affordable community. Heshl's current bail conditions prohibit travel to Florida. I have communicated with AUSA Jilan Kamal who consents to this application. I have also communicated with Jessica Killian, Heshl's Pre-Trial Officer and she informed me that Pre-Trial Services has no objection to the proposed modification.

Accordingly, we respectfully request that Your Honor modify Heshl Abraham's bail conditions to permit travel to the State of Florida.

Respectfully submitted,



Steven Y. Yurowitz

cc: AUSA Jilan Kamal (by ECF)
PTO Jessica Killian (by Email)